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June 1, 2015

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RE: *In re Automotive Parts Antitrust Litigation*

Dear Sirs:

This is to follow up regarding the discovery requests given to Delphi on December 3, 2014 (the “Original Discovery Requests”). Based on discussions between Delphi and the Plaintiffs in the Automotive Parts Antitrust Litigation (the “Plaintiffs”), and the presentation provided by Delphi on February 5, 2015, the Plaintiffs have narrowed the discovery requests to the following:

(1) Sourcing Files:

- All documents included in sourcing files that are reasonably available and relate to Wire Harness Products sold from January 1, 1998 through the present. Based on information provided by Delphi, the sourcing files should include at least:
 - (a) Internal management review packages submitted to the Delphi Price Review Group (the “DPRG”) for approval of bids in

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response to Requests for Quotes (“RFQs”) for Wire Harness Products,

- (b) Requests for procurement from customers and quote packages sent to customers in response to procurement requests for Wire Harness Products, both for business Delphi did and did not win
 - (c) Supplier agreements entered into for successful bids
 - (d) Preferred supplier agreements, such as the Aligned Business Framework-related agreements.
 - (e) Internal and external communications, including e-mails—
 - (f) Financial and price ladder analyses, and
 - (g) Documents related to APR requests and other discount requests
- If the above elements do not exist in sourcing files, please advise the parties. The parties request that these materials be produced from other sources to the extent they do not exist in sourcing files.
 - Please also provide sufficient information to explain any fields used, codes used, methods used, or data contained in the sourcing files.

(2) Transactional Data and Documents:

- Transactional data that are kept in your SAP database (or other electronic databases if not available in SAP), are reasonably available, and concern your sales (or purchases from a contract manufacturer or supplier) of Wire Harness Products from January 1, 1996 through the present. To the extent available, each transaction record should include:
 - (a) product type;
 - (b) product description, including the model, make, and model year of the vehicle(s) for which the product was intended, geographic market for which the vehicle was intended, and whether the product was an original equipment or replacement part;
 - (c) total sales amount;
 - (d) quantity (units) (for each part number of Wire Harness Products sold and for each OEM model supplied, the quantity you sold your customers, including, but not limited to, OEMs and Tier 1,2 and 3 suppliers);
 - (e) unit price (for each part number of Wire Harness Products sold and for each OEM model supplied, the prices you charged your customers (including, but not limited to, OEMs and Tier 1,2 and 3 suppliers) and

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the prices your customers paid for Wire Harness Products, including any discounts, rebates, other payments, or other incentives you made or provided to your customers);

- (f) any costs (e.g., total cost, variable cost, materials cost, fixed cost, semi-variable cost, marginal cost, standard cost, research and development costs, engineering costs, plant and equipment investment for any plant or equipment used to produce the product) to you associated with the product;
- (g) sales date;
- (h) adjustments, including but not limited to, discounts, rebates, credits, and debits in the manner provided whether by product or by total sale;
- (i) descriptions of such adjustments;
- (j) currency and exchange rate;
- (k) product identifier or code;
- (l) part number for each product;
- (m) monetary components of the transaction beyond unit price (i.e., sales tax, shipping or delivery fees);
- (n) purchaser, including all Customer information, including, but not limited to, customer ID number, sold to name, sold-to address, and ship-to name and address (if not on invoice);
- (o) purchaser invoice-to (including bill-to and sold-to) and ship-to information, including all purchaser address information;
- (p) location(s) to which product and invoice were sent;
- (q) the legal entity making the sale;
- (r) location of sale;
- (s) invoice number;
- (t) all other information included on invoices issued during the relevant period;
- (u) all information related to any return or refund; and
- (v) all information related to rebates, discounts and free goods including information sufficient to tie them to sales transactions
- (x) plant and capacity utilization rates for any plant you used to produce Wire Harness Products

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- (y) quantity of each part number of Wire Harness Products you produced from any plant you used to product Wire Harness Products
- (z) Revenues (gross and net of any discounts and rebates) for each part number of Wire Harness Products you produced and for each customer to whom you sold Wire Harness Products
- (aa) Cost tables you prepared for your own use or for the use of a customer or potential customer
- (bb) Profits, losses, and margins (gross and net) for each type of Wire Harness Products you produced and for each customer for which you produced Wire Harness Products from any plant you used to produce Wire Harness Products;
- (cc) Financial records (e.g., general ledger data, balance sheets, income statements) relating to your Wire Harness Products business;
- (dd) Customer information, including, but not limited to customer number, products sold, quantity sold, net and gross price charged, sold-to name, and ship-to name and address, sales terms, ship to and sold to parent company, and identification of subsidiaries, affiliates, and joint ventures;
- (ee) Average cost of producing each type of Wire Harness Product for each customer and for each model vehicle
- (ff) Bids and other prices you submitted to your customers or potential customers (including, but not limited to, OEMs and Tier 1, 2, and 3 suppliers) to produce and supply Wire Harness Products

- Please also provide sufficient explanation of any fields used, codes used, methods used, or data contained in the transactional data requested above, including but not limited to, part decoders, customer code legends, or supplier code legends, adjustment code legends, or description code legends.

(3) Strategic and Business Plans

- Your business plans and strategic plans that are reasonably available and that relate to Wire Harness Products sold from January 1, 1998 through the present. To the extent any business or strategic plan covers other automotive products in addition to Wire Harness Products, the Wire

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Harness Product information can be separated and produced on its own provided that the information is self-contained and does not require referencing other product information for a full understanding of the Wire Harness Product business or strategic plan.

- Please also provide other information sufficient to explain any fields used, codes used, or data contained in the business or strategic plans.
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- (4) Documents regarding Delphi's pricing policies and the training and instruction provided to employees regarding bidding and setting prices submitted to OEMs and other purchasers or potential purchasers, as well as determining discounts and price reductions for Wire Harness Products, from January 1, 1998 through the present.
 - (5) Documents comparing Delphi to its competitors with regard to prices, Wire Harness Product features, costs, RFQ results and profits from January 1, 1998 through the present.
 - (6) Studies, reports, or analyses in Delphi's possession comparing the prices of Wire Harness Products to the prices of vehicles from January 1, 1998 through the present.

Sincerely,

Omar Ochoa